Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Delete, Delete, Delete	)	GN Docket No. 25-133

COMMENTS OF HAMILTON RELAY, INC.

Hamilton Relay, Inc. ("Hamilton"), by its counsel, submits these comments in response to the *Public Notice* ("*Notice*") in the above-captioned proceeding.[1] In this proceeding, the Commission has invited public input on identifying FCC rules for the purpose of alleviating unnecessary regulatory burdens. FCC is seeking comment on deregulatory initiatives that would facilitate and encourage network investment, developing infrastructure, and offering innovative and advanced capabilities.

Hamilton is a provider of various forms of Telecommunications Relay Services ("TRS"), including traditional TTY, Speech-to- Speech, PSTN-based Captioned Telephone Service ("CTS") and IP CTS. Hamilton's comments in this proceeding are limited to the TRS rules adopted Part 64, Subpart F, which implements Section 225 of the Communications Act of 1934, as amended (the "Act"). Section 225 of the Act codifies Title IV of the Americans with Disabilities Act of 1990 ("ADA") which requires that the Commission ensure that TRS is available "to the extent possible and in the most efficient manner" to individuals with hearing and speech disabilities in the United States, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice

[1] *In Re: Delete, Delete, Delete,* Public Notice, DA 25-219 (rel. Mar. 12, 2025).

communication services.[2]

Hamilton strongly supports the integrity and continued evolution of the TRS program, which is a vital service mandated by the ADA for individuals who are deaf, hard of hearing, DeafBlind, and speech-disabled. In alignment with the Administration's directive to identify rules that are obsolete or no longer in effect, Hamilton recommends the deletion of three discrete provisions of the Commission's TRS rules that are defunct as a practical matter and are no longer supported by technology or usage trends. These comments are narrowly tailored to the following TRS rules.

Section 64.604(a)(3)(ii)

This rule provides: "Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call." Hamilton supports modifying this rule to specifically remove any obligation to provide Directory Assistance due to its increasing lack of availability and use. While Directory Assistance is still available from some carriers, with the rise of the Internet it is becoming more and more difficult to accommodate this request as carriers discontinue this service. For example, AT&T discontinued Directory Assistance for landline customers in 2023.[3]

Section 64.604(a)(3)(iv)

This rule provides: "Relay services other than Internet-based TRS shall be capable of handling pay-per-call calls." Hamilton supports the removal of this requirement due to its lack of

[2] 47 U.S.C. § 225(b)(1).
[3] AT&T, "Operator and Directory Assistance is ending," https://www.att.com/support/article/u-verse-voice/KM1511460/ (last visited Apr. 5, 2025).

availability and use. For a number of reasons, including stricter regulations, high fees, the rise of the Internet and competition from other communication channels such as social media, 900 pay-per-call calls are no longer available and have not been available since 2013, with AT&T announcing its decision to discontinue this service in 2002. While 800 Bill to Credit Card is still available, it is not widely known, used or understood, and there is no justification to continue supporting it.

To highlight the lack of use of pay-per-call calls, during a recent twelve-month review of one of Hamilton's state relay programs, Hamilton identified no usage of pay-per-call services through Relay. Hamilton believes that this requirement lacks any continued relevance and therefore recommends that the rule be rescinded.

Section 64.604(b)(1)

This rule provides: "ASCII and Baudot. TTY-based relay service shall be capable of communicating with ASCII and Baudot format, at any speed generally in use. Other forms of TRS are not subject to this requirement." In November 2024, the Consumer & Governmental Affairs Bureau issued a conditional waiver of the rule requiring TTY-based relay providers to offer ASCII services. The waiver is valid for two years (i.e., until November 22, 2026), or until the FCC addresses T-Mobile's request to amend section 64.604(b)(1) and eliminate the ASCII compliance requirement, whichever is earlier.[4]

Hamilton requests that the Commission grant T-Mobile's requested rule change, or alternatively a permanent waiver of this requirement due to its infrequent use. Hamilton suggests the following update to remove the ASCII requirement: "~~*ASCII and*~~ *Baudot.* TTY-based relay service shall be capable of communicating with ~~ASCII and~~ Baudot format.~~, at any speed~~

[4] *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, DA 24-1180, ¶ 1 (CGB 2024).

~~generally in use.~~ Other forms of TRS are not subject to this requirement."

Respectfully submitted,

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